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September 2, 2014

Office of the Secretary
Federal Communications Commission
FCC Headquarters
445 12th St., SW
Room TW-A325
Washington, DC 20554

RE: WC Docket No. 13-184

As a district technology coordinator for over 20 years, thank you for supporting the educational use of technology and the Internet in schools. Technology and the Internet are essential tools in the educational process, and providing these tools has created new ongoing cost burdens to schools.

The Commission's plans to modernize the E-Rate program introduce a good deal of change to the E-Rate program. Please accept these comments and questions regarding the information you have thus far published.

Please reconsider the use of the district matrix for all schools.

The requirement that applicants apply on a per-entity basis using the district-wide discount rate (Sec. 104) is unfair to districts which include schools with significantly higher poverty rates than the district average. For instance, Shelby County Schools has several '80% schools,' but the district's overall matrix is just 51%. At the same time that these schools will be barred from funding consideration along with their discount rate 'peer group,' wealthy schools in overall poor districts could be funded, possibly at 85%.

The rationale for this rule, shown below, appears to have nothing to do with creating fairness for students living in poverty.

Pg. 158 - The requirement that applicants use a district-wide data to determine their discount rates⁸⁴ will reduce reporting requirements because districts will no longer have to perform a discount rate calculation for each school within a district.

Including each school's enrollment make-up, including the number of students on NSLP, is not an overdue burden. This has been the practice for years, whether applying for one or multiple entities within a district. If districts were able to apply for Category 2 funding district-wide then this rationale would make sense, but since they must apply on a school-by-school basis, it does not.

Please consider either eliminating or changing this rule. 'Poor' schools should not lose the opportunity for Category 2 funding while those who would not otherwise be in the discount band being funded have the opportunity to receive funds. At a minimum, each school should be able to use either the district or the school

	<p>the purchase of internal connections and basic maintenance. Unlike the traditional approach to internal connections, for managed Wi-Fi service contracts, schools and libraries obtain LANs/WLANs as a service for a period of three to five years from a third party who manages the entire system, providing operations and maintenance for the life of the contract.²⁸¹ In other cases, the school or library may own the equipment, but have a third party manage it for them.</p> <p>²⁸⁰ See, e.g., ADTRAN NPRM Comments at 22-23; Bright House PN Comments at 2-3; C-Spire Fiber PN Reply Comments at 2-4; EPS PN Comments at 9; ENA PN Comments at 1; The Quilt PN Comments at 4; Sprint PN Comments at 2; Verizon PN Comments at 5; WVDE PN Comments at 8-9.</p>
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The award criteria are incomplete.

Section 79 says:

If there is insufficient funding available to meet the need at a particular discount rate for category two, we will prioritize funding within a discount rate based on the percentage of students that are eligible for free and reduced school lunches within each applicant's school district.

This section does not describe which district will be funded in the event of a tie.

The Data Retrieval Tool (DRT) needs to provide more data.

Currently, the SLD's Data Retrieval Tool does not include the actual number of students and NSLP participation. Nor does it extend the discount rate out to even the first decimal point. Consequently, there is no way for anyone outside the Bureau to see what a district's percentage is exactly. This could be important considering the award criteria above.

It also would be helpful if the Data Retrieval Tool indicated why applications were not funded, at least in simple terms such as lack of funds, cancellation, or not passing PIA examinations.

The DRT should allow for a download of all applicants at one time rather than forcing users to download state by state and then recompile the information. Downloading data all 50 States and the territories on an individual basis is very time-consuming and is a barrier to transparency.

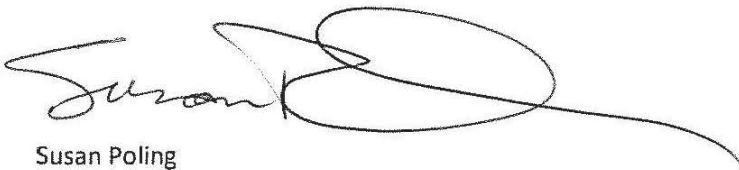
Also, under the current Priority 1 definition, it is difficult, if not impossible, for outside parties to use the SLD's Data Retrieval Tool to distinguish what amount of Priority 1 funding is used for broadband Wide Area Networks and which portion is used for voice services. This detail is usually included in the description on the applicant's Item 21 attachment. Will the Bureau create a new category in order to distinguish between the two starting in 2015? This would enable parties outside the SLD to more easily see the amount of funding requested for the soon-to-be phased out voice services, enabling them to see how much money may potentially become available for Category 2 or be added to Category 1. It will also allow interested parties to see how much funding districts are losing as a result of this change.

1. Section 92 says that the Bureau relied on NCES data along with other sources. Footnote 197 it shows NCES class sizes to be 21.2 (elementary) and 26.8 (secondary). Without diving deeper into the portion of elementary schools vs. secondary schools, this produces an average class size of 24. The section also says that they have chosen to use a per pupil ratio slightly higher than the NCES statistics. The 17 to 1 student to classroom ratio used by the Bureau is appears to be 30% higher than the NCES average of 24 to 1. Is 30% really just slightly higher?
2. Section 93 shows that the price per student per year for managed Wi-Fi ranges from a low of \$9 to \$15 per student to a high of \$29 per student. Yet the Bureau chose to use \$30 per student per year.
3. Section 94 says: "Commenters also submitted three different Wi-Fi cost models into our record: the EdSuperHighway/CoSN ConnectED Cost Model,²⁰¹ the EdSuperHighway/ CoSN Ongoing Cost Model,²⁰² and the Cisco Model.²⁰³ The first of these, the EdSuperHighway/CoSN ConnectED Cost Model, produces the lowest estimate of required costs, producing a nationwide, average cost of approximately \$21 per student per year, well below the budget we set here.²⁰⁴ *This model assumes substantial existing infrastructure however, the extent of which will vary greatly between districts, so it is poorly suited to setting reasonable, nationwide budgets that will be sustainable on an ongoing basis.*²⁰⁵ *We thus do not rely on this model.*"

It seems ironic that the Bureau thinks that this model is inconsequential when the E-Rate program itself has been putting millions and billions of dollars into school LAN infrastructure for years. Having funded this infrastructure, shouldn't the Bureau think it reasonable that there is substantial existing infrastructure in at least some schools – especially those that will be first to be funded for Category 2 since they were the same high poverty districts that have been funded first for Priority 2 for many years?

Considering that the Bureau expects that schools should work towards getting the lowest price possible, the way that the Bureau used the information it relied on to arrive at a higher price than the information supports does not set a good example for school districts, who are now expected to get the lowest price via bidding, consortia, or master contracts. Is the Bureau expecting that the \$1 Billion influx will cause an overall rise in the cost of WLAN equipment or services? Every time a district pays more than it should for Category 2, money for lower discount level schools is eliminated. Therefore, setting an allocation, or 'cap', higher than it needs to be is a disservice to districts that are not at the top of the discount range.

Sincerely,



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